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June 15, 2017

**Via ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

***Re: WC Docket Nos. 16-143, 15-247, 05-25, RM-10593***

Dear Ms. Dortch:

On June 13, 2017, Frank Simone, Debra Clemens, and the undersigned, all of AT&T, and Chris Shenk of Sidley Austin, LLP, met with Lisa Hone, David Zesiger, Alexandra Mays, Emily Lentz, Pamela Arluk, Steve Funkhouser, R.L. Smith, Vienna Jordan, James Lichford, Robin Cohn, Irina Asoskov, Justin Faulb, Lynne Engledow, Marv Sacks, and William Kehoe, all of the Wireline Competition Bureau, to discuss the Business Data Services Report and Order.<sup>1</sup>

During the meeting, we discussed issues related to the technical implementation of the Order, including the impact of the Order's effective date on price cap BDS services; guidebook and wire center-to-county mapping best practices;<sup>2</sup> the review process for adjustments to BDS offerings in non-competitive counties going forward; and the timing of the effectiveness of the Order's detariffing relief. Bureau staff informed us that the rules governing permissive detariffing adopted in the Order do not require review by the Office of Management and Budget ("OMB") and that price cap ILECs may therefore begin detariffing on a permissive basis on August 1, 2017, the effective date of the Order.<sup>3</sup> Bureau staff also indicated that the rules adopted in the Order governing mandatory detariffing are subject to OMB review, and thus those rules will become effective when the OMB approval process is complete.

Pursuant to section 1.1206 of the Commission's rules, this *ex parte* notification is being filed electronically for inclusion in the record of the above-referenced proceeding. If you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,  
/s/ Caroline Van Wie

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<sup>1</sup> *Business Data Services in an Internet Protocol Environment et al.*, Report and Order, WC Docket No. 16-143 *et al.* (rel. Apr. 28, 2017) ("BDS Order" or "Order").

<sup>2</sup> See *BDS Order* ¶ 170, n.450; ¶ 111, n.335.

<sup>3</sup> See *Business Data Services in an Internet Protocol Environment et al.*, 82 Fed. Reg. 26,660 (June 2, 2017).

cc: Lisa Hone  
David Zesiger  
Alexandra Mays  
Emily Lentz  
Pamela Arluk  
Steve Funkhouser  
R.L. Smith  
Vienna Jordan  
James Lichford  
Robin Cohn  
Irina Asoskov  
Justin Faulb  
Lynne Engledow  
Marv Sacks  
William Kehoe